
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 16-32728
Chadell Tribett)	
)	Chapter 13
)	
Debtor(s).)	Judge Timothy A. Barnes

NOTICE OF MOTION

TO: Chadell Tribett, 9147 S Woodlawn Ave. Chicago, IL 60619 *via US mail*

Internal Revenue Service, P.O. Box 7346 Philadelphia PA 19101-7346 *via US mail*

Department of the Treasury, Internal Revenue Service, Kansas City, MO 64999-0025 *via US mail*

Trustee Marilyn O Marshall, 224 South Michigan Ste. 800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **November 8, 2018 at 9:30 a.m.**, I shall appear before the Honorable Judge Timothy A. Barnes at the Federal Courthouse, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604, or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on October 18, 2018 before the hour of 7:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St, Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Chadell Tribett, by and through her attorneys, the law office of CUTLER & ASSOCIATES, and in support of this Motion, states as follows:

1. On October 13, 2016 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor's Chapter 13 plan on January 5, 2017. The confirmed plan provided for monthly payments of \$220 for 36 months with unsecured creditors receiving a minimum of 9% of their claims.
3. The Debtor's plan was modified on September 28, 2017 to defer the unpaid tax refund for 2016 to the end of the debtor's plan.
4. The Debtor owes the Internal Revenue Service for tax year 2015. The Debtor has provided her counsel with information regarding the 2015 tax debt and the total amount owed is \$7,810.32.
5. The last date to file governmental claims in the instant case was April 11, 2017.
6. The Debtor has a current motion to extend time to file a claim on behalf of the Internal Revenue Service to add them to her repayment plan before this Honorable Court.
7. The Debtor is looking to modify her plan to increase to her payment to account for the debt she owes to the Internal Revenue Service so they can be paid as an unsecured

priority claim.

8. The Debtor seeks to modify the plan to raise the monthly payment to \$450 a month to the end of the Plan.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation to raise the plan payment to \$450 a month beginning December 2018 until the end of the plan; and for such further relief that this Court may deem just and proper.

Dated: October 18, 2018

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St. Skokie, IL 60076
Phone: (847) 673-8600